

The inspection will be conducted pursuant to Section 11 of the Toxic Substances Control Act (TSCA) to determine compliance with TSCA Sections 4, 5, 8, 12 and 13. Please make available the following documents, lists, and other information on electronic media (CD/DVD/USB Flash Drive) as an Adobe portable document file (.pdf). I will ask you to send a copy of the electronic files to the Region 2 Document Control Officer (name and address below). For each **list** requested, also include a separate Microsoft Excel Workbook. If this facility is not engaged in the activities for which information is requested, please state the activity and confirm that it is not applicable to this facility.

☐ Document 1. Premanufacture Notices (PMNs) submitted by your company, or requests for exemption from the PMN review process, including Low Volume, Test Marketing, and Polymer Exemptions, and any EPA responses to these submittals or requests;

☐ Document 2. Any Bonafide Intent, Significant New Use Rule Notices and TSCA Section 5(e)/(f) Consent Orders;

☐ Document 3. Research and development activities and procedures in effect at the facility, specifically as related to compliance with the requirements of a TSCA Research and Development Exemption;

☐ Document 4. Recordkeeping and reporting under TSCA Section 8 Rules, including the Preliminary Assessment Information Rule (PAIR), Inventory Update Rule (IUR) and TSCA Sections 8(c), 8(d), and 8(e);

☐ Document 5. Facility and/or corporate policies developed to ensure compliance with TSCA Sections 4, 5, 8, 12 and 13:

☐ Document 6. Manufacturing and process diagrams for each chemical produced at the facility. Indicate all steps including on-site use, marketing, transfer, recycling, and waste disposal. Also include chemicals that are not intended for sale or distribution;

☐ Document 7. For each chemical reacted or processed at the subject facility, indicate if the subject facility is a toll manufacturer or a co-manufacturer of the chemical (if so, include the name of the party for whom the chemical is manufactured), whether the manufacturing process is continuous or batch, and how many employees are directly involved with the manufacturing process for each chemical (including engineers, foremen, packagers and handlers); and,

☐ Document 8. A Copy of Record of the 2012 Chemical Data Reporting submittal filed by or on behalf of the subject facility.

List # 1:

Prepare a list of chemical substances that were imported or manufactured between January 1, 2010, and December 31, 2011. The list should include the following information for each component:

1. Accepted chemical name(s);

2. Chemical Abstracts Service Registry Number (CASRN) or the EPA accession number;
3. Production date;
4. Indicate if the chemical is imported directly by the subject facility, manufactured at the subject facility, is a byproduct, is an impurity, or is an isolated intermediate. If you identify a chemical as a byproduct, indicate the process by which it is produced.
5. Quantity produced per batch, or imported per shipment; and,
6. Identification number used to track each.

List # 2:

Prepare a list of all the chemical substances (including mixtures) that were purchased from domestic suppliers (U. S. distributors) between January 1, 2010, and July 31, 2015. The list should include the following information for each component:

1. Brand or product name;
2. Accepted chemical name(s) of each component;
3. CASRN or the EPA accession number of each component; and,
4. The supplier.

List 3

Prepare a list of products (chemical substances and mixtures and the components of each) by CASRN and percentage of each of the products that were exported to foreign countries between August 1, 2010, and July 31, 2015. The list should include the following information for each component:

1. Brand or product name;
2. Accepted chemical name(s) of each component;
3. CASRN or the EPA accession number of each component;
4. The percentage of each component; and,
5. The destination country.

Terms used in this document are defined in the Code of Federal Regulations, Chapter 40, Sections 704.3, 704.25, 704.33, 707.63, 710.3, 710.43, 711.3, 712.3, 716.1, 717.3, 720.3, and 721.3, (40 C. F. R. §704.3, 704.25, 704.33, 707.63, 710.3, 710.43, 711.3, 712.3, 716.1, 717.3, 720.3, and 721.3).

If you are unable to provide the identity of the chemical substances or mixtures because your suppliers or customers have a Confidential Business Information (CBI) claim on the products that were purchased domestically, imported or exported, please identify those products along with the suppliers and have them available during the inspection. The records associated with this inspection/information request should be submitted to

Mr. Mark Bean
Document Control Officer
U.S. EPA Region 2 Edison
Toxics Section
2890 Woodbridge Avenue, MS-10
Edison, New Jersey 08837-3679

Pursuant to the Code of Federal Regulations, 40 CFR, Part 2, Subpart B, you are entitled to claim as CBI any or all of the information provided to EPA; this is applicable only if the claim is consistent with the procedures described in the regulations cited above. If you do not assert a confidentiality claim at the time the information is provided to EPA, it may be released to the public without further notice.

Please prepare a briefing on your company's history, products, and general facility information such as number of employees, NAIC code(s), DUNS Number, etc. The inspector will then conduct a brief walkthrough of the facility. The inspection is anticipated to take between two and four hours. If you have any questions, please contact Mr. Bean of the EPA Region 2 staff at (732) 321-6606.